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OFFICE OF THE
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July 24, 2000

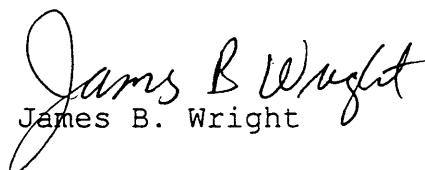
David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Docket No. 97-00409 (Payphone)
UTSE Discovery Requests

Dear Mr. Waddell:

Pursuant to the scheduling order adopted in this case, enclosed for filing are United Telephone-Southeast, Inc.'s First Discovery Requests to AT&T, BellSouth, CAD, Commission Staff, Citizens, Small Company Coalition, TPOA and WorldCom.

Sincerely yours,


James B. Wright

JBW:er
Enclosures
CC: Parties of Record (w/enclosures)
#18322

POSTED
8-1-00

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: All Telephone Companies Tariff Filings Regarding Reclassification of
Pay Telephone Service as Required by FCC Docket No. 96-128

DOCKET NO. 97-00409

**FIRST SET OF DISCOVERY REQUESTS OF UNITED TELEPHONE-
SOUTHEAST, INC. TO AT&T, BELL SOUTH, CAD, COMMISSION STAFF,
CITIZENS, SMALL COMPANY COALITION, TPOA AND WORLDCOM**

Comes now United Telephone-Southeast, Inc. ("United") and propounds this First Set of Discovery Requests to AT&T Communications of the South Central States, Inc. ("AT&T"), BellSouth Telecommunications, Inc. ("BellSouth"), Citizens Telecommunications Company of Tennessee and Citizens Telecommunications Company of the Volunteer State (jointly "Citizens"), Consumer Advocate Division of the Office of Attorney General ("CAD"), Staff of the Tennessee Regulatory Authority ("Commission Staff"), Tennessee Payphone Owners Association ("TPOA"), Coalition of Small Local Exchange Companies ("Small Company Coalition") and WorldCom, Inc. ("Worldcom"). Please respond to the following interrogatories and requests for data in accordance with the discovery schedule established in this case. Please advise undersigned counsel in writing not later than three days before the due date if you anticipate any problems in responding to any of the interrogatories or data requests.

DEFINITION

1. "You" means AT&T, BellSouth, CAD, Commission Staff, Small Company Coalition, TPOA and Worldcom, and any of their respective subsidiaries, affiliates or agents.

INSTRUCTIONS

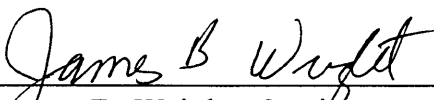
In the event the information is not available in the specific format requested, either in part or in total, please provide the information requested in the format maintained in the ordinary course of business.

All interrogatories and requests for data are continuing in nature and require supplemental responses should information later become known.

REQUEST No. 1

Please provide the initial and any revised responses to all formal or informal interrogatories or data requests or other discovery made by any party to this proceeding to you when you provide that response to the requesting party.

Submitted this 24th day of July, 2000.



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CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on July 24, 2000 the foregoing document was served upon the following parties of record addressed as follows:

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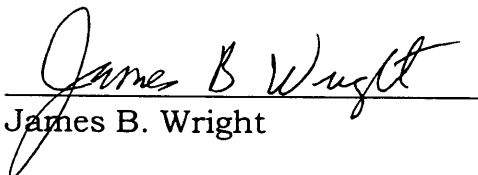
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